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7	STATE OF	WASHINGTON
8	KING COUNTY SUPERIOR COURT	
9	THE STATE OF WASHINGTON,	NO. 09-1-01692-1 SEA
10	Plaintiff,	NO. 09-1-01092-1 SEA
11	v.	MOTION AND ORDER TO AMEND INFORMATION (CrR 2.1(d))
12	RUSSELL SCOTT NOBLE,	INFORMATION (CIR 2.1(u))
13	Defendant.	
14	COMES NOW the State of Washington by ROBERT M. MCKENNA, Attorney	
15	General, by and through his Assistant Attorney General, and moves the court for an order	
16	permitting the filing of an amended information in the above entitled cause as allowed by	
17	CrR 2.1(d).	
18	That Melanie Tratnik is an Assistant Attorney General in and for the State of	
19	Washington, and is familiar with the records and files herein, and certifies that:	
20	() Newly available information is set forth in the prosecutor's case summary and	
21	request for bail.	
22	() The Amended Information more accurately reflects the defendant's conduct.	
23	(X) The amendment is being made pursuant to plea negotiations.	
24	The Original Information charges the defendant with one count of vehicular assault	
25	committed against Leslie L. Workman and a second count of vehicular assault committed	
26	against Lyndsey A. Jones. The Original In	nformation also lists all three manners in which
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1	vehicular assault may be committed; the reckless manner prong, the under the influence o	
2	intoxicating liquor or any drug prong, and the disregard for the safety of others prong. The	
3	Amended Information combines both victims under count one and charges only the under the	
4	influence of intoxicating liquor or any drug prong. This prong produces the highest standard	
5	sentencing range of the three available prongs. The State will be moving to dismiss count two	
6	upon the defendant's acceptance of the plea on count one. This negotiated plea reflects the	
7	relatively minor injuries suffered by the victims, the defendant's cooperation with lav	
8	enforcement at the scene, and his willingness to take responsibility for the offense by pleading	
9	guilty. This plea agreement is made with the agreement of both victims.	
10	Under penalty of perjury under the laws of the State of Washington, I certify that the	
11	foregoing is true and correct.	
12	DATED this 20th day of May, 2009, at Seattle, Washington.	
13	ROBERT M. MCKENNA	
14	Attorney General	
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16	MELANIE TRATNIK, WSBA# 25576 Assistant Attorney General	
17	Attorney for Plaintiff	
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1	<u>ORDER</u>		
2	THIS MATTER having come before this court upon the motion of the State of		
3	Washington, good cause having been demonstrated, and the defendant not being prejudiced in		
4	any substantial right, the State of Washington is allowed to file an Amended Information		
5	herein.		
6	DONE IN OPEN COURT this day of May, 2009.		
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9	JUDGE		
10	Presented by:		
11	Tresented by.		
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13	MELANIE TRATNIK, WSBA# 25576 Assistant Attorney General Attorney for Plaintiff		
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